

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
MIDDLE DISTRICT OF FLORIDA, TAMPA DIVISION

IN RE: EDWARD YOUNG and
MINNIE YOUNG
Debtors

CASE NO. 9:19-bk-09731-FMD

DEBTOR'S OBJECTION TO CLAIM NO. 4-1 OF STACEY MANESS

**NOTICE OF OPPORTUNITY TO
OBJECT AND REQUEST FOR HEARING**

Pursuant to Local Rule 2002-4, the Court will consider the relief requested in this paper without further notice or hearing unless a party in interest files a response within 30 days from the date set forth on the attached proof of service, plus an additional three days for service if any party was served by U.S. Mail.

If you object to the relief requested in this paper, you must file a response with the Clerk of the Court at Clerk of the Court at United States Bankruptcy Court, 801 N. Florida Avenue, Suite 555, Tampa, FL 33602-3899 and serve a copy on the movant's attorney FRANK RIBEL, JR., 25 East Oak Street, Arcadia, FL 34266, and any other appropriate persons within the time allowed.

If you file and serve a response within the time permitted, the Court will either schedule and notify you of a hearing or consider the response and grant or deny the relief requested without a hearing. If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, will proceed to consider the paper without further notice or hearing, and may grant the relief requested.

The Debtor(s), EDWARD YOUNG and MINNIE YOUNG, by the undersigned attorney, hereby Objects to the claim No. 4-1 of STACEY MANESS and would show:

STACEY MANESS filed a claim and alleged that said claim was in the amount of \$100,000.00

1. Debtor's objections are that said claim is disputed;
2. That said claim is not properly documented and that debtor is unable to ascertain what is the basis for the alleged claim and how it attained such an excessive alleged balance;
3. The claim is speculative and not established by written and signed documentation nor established through legal process;
4. Other grounds to be assigned.

WHEREFORE, Debtor requests that this Honorable Court; enter an Order approving said objection, finding the claim to be invalid and grant such other and further relief as it shall deem to be fair and equitable.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by electronic notice to the following, Stacey Maness c/o Christina Goldberg, Esq., Luhrsen Goldberg, LLC, Attorney for Plaintiff, 6954 Professional Parkway East, Lakewood Ranch, Florida 34240 cag@lginjuryfirm.com, Jon Waage, Trustee, and U.S. TRUSTEES OFFICE, this 27th day of March, 2020.

/s/ Frank Ribel, Jr
FRANK RIBEL, JR.
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Florida Bar No. 0098093
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